

**All Committee meetings were cancelled with effect from 23rd March, 2020 due to the COVID-19 emergency.**

**The recommendations in this report were approved by an Executive Director of the Council, acting under delegated authority in terms of paragraph 2.1.1 of the Council's List of Officer Powers**

Approved by Executive Director (Enterprise and Environment) – 25th March, 2020

## Responses to Fourth National Planning Framework (NPF4) Call for Ideas

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**Report by:** Keith Winter, Executive Director (Enterprise and Environment)

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**Wards Affected:** All

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### Purpose

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To seek approval for submissions to the fourth National Planning Framework (NPF4) Call for Ideas. There are two relevant submissions: a Fife Council response (Appendix 1); and a regional submission relating to the Edinburgh and South East Scotland City Region area (Appendix 2).

### Recommendation(s)

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It is recommended that Committee:

- (i) approves the Fife Council response to the NPF4 Call for Ideas (as set out in Appendix 1 to this report) and remits to the Head of Planning to submit the Fife response to the Scottish Government on or before 31st March, 2020;
- (ii) endorses the regional response to the NPF4 Call for Ideas (as set out in Appendix 2 to this report), noting that Fife Council has worked with regional partners to develop this;
- (iii) notes that both responses pertain to the whole of Fife, including North East Fife; and
- (iv) notes that there will be further opportunities to engage with Scottish Government on the development of NPF4 over the coming months. It is expected that the draft NPF4 will be laid in the Scottish Parliament around September 2020, the draft will be consulted on and brought back for Parliamentary approval in 2021.

### Resource Implications

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There are no direct financial or staff resource commitments relating to the proposed submissions. The responses do set out a position in respect to managing both economic and demographic growth. Proactive management of growth is critical to dealing with the associated infrastructure demands and revenue pressures that this inevitably creates.

### Legal & Risk Implications

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The proposed submissions to the Call for Ideas do not commit Fife Council to any actions and do not have any legal or risk implications. However, failing to submit a response at this stage may result in it being more difficult to engage in future stages of the development process for NPF4.

## Impact Assessment

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An Equality Impact Assessment does not require to be carried out at this stage as this report does not propose any change to existing Council policies. An Equality Impact Assessment may be required later in the NPF4 development process for more detailed Fife Council and/or regional submissions.

## Consultation

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The Head of Finance and the Head of Legal and Democratic Services have been consulted in the preparation of this report.

## 1.0 Background

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- 1.1 The fourth National Planning Framework (NPF4) will consider what Scotland should look like in 2050, set out national planning policies and guide where future development should take place.
- 1.2 The draft NPF4 will be laid in the Scottish Parliament around September 2020 and at that stage there will be formal parliamentary scrutiny and wide public consultation. A revised version will be brought back to Parliament in 2021 for approval, before it can be adopted by the Scottish Ministers.
- 1.3 Before that, to help shape the draft, the Scottish Government wishes to stimulate an open conversation, involving a wide range of people and organisations, about what they will need to plan and build in the future. The “Call for Ideas” is an early part of this process.
- 1.4 The Call for Ideas consultation focuses on 5 key issues as set out below: -
  1. What development will we need to address climate change?
  2. How can planning best support our quality of life, health and wellbeing in the future?
  3. What does planning need to do to enable development and investment in our economy to benefit everyone?
  4. How can planning improve, protect and strengthen the special character of our places?
  5. What infrastructure do we need to plan and build to realise our long-term aspirations?

## 2.0 Planning for the Future

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### Overview

- 2.1 The purpose of planning is to manage the development and use of land in the long-term public interest. Past trends and future projections provide an idea of the challenges and opportunities that lie ahead. NPF4 will seek to take account of key environmental, demographic and economic change forecast during the lifetime of the framework as set out below.

### Climate Change

- 2.2 As a result of climate change, consensus of scientific research is that Scotland's weather will become more variable, with hotter and drier summers and milder and wetter winters. Sea level rise will affect Fife's coastline. More summer heat waves, extreme temperatures and drought are expected. There will be more and heavier rainfall and less frost and snowfall. The built environment will need to change to adapt to this and we will need to do much more with the built environment to help reduce carbon emissions.

### Population

- 2.3 It is expected that the population of Scotland will grow by around 5% by 2041, as a result of migration from other parts of the UK and overseas. Scotland's population will also age considerably over the next 20 to 30 years, with the number of people over 75 increasing 25% by 2041. The number of children in Scotland will fall by around 2% and our working age population will only increase by 1% in the same period. As a result, planning will need to consider what is needed to meet the future everyday needs of people of all ages and in particular to plan for older people.

### Economy

- 2.4 Fife's economy relies on our significant natural resources and key sectors including food and drink, tourism, energy and financial services. The impacts and opportunities arising from Brexit on our future economy cannot be fully predicted and, in the long-term, there will be a need to respond to global restructuring, including the influence of new and emerging markets and technological change. Investing in infrastructure, growing our most successful sectors and maintaining a highly skilled workforce will help us to respond to these changes. The quality of Scotland's places and planning that actively enables good quality development could play a key role in supporting inclusive growth.

### Places

- 2.5 Fife's places continue to evolve and we can expect continuing challenges such as vacant and derelict land, changing town centres, rural depopulation and pressures on natural resources. Climate change will compound and complicate these pressures. Over the long-term, the distribution of future development and the balance between rural and urban living will need to be carefully planned to ensure we can meet changing needs and expectations.

## 3.0 Further Information

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- 3.1 Further information on the Call for Ideas and NPF4 is available at [www.transformingplanning.scot](http://www.transformingplanning.scot). The website also contains details of events and other opportunities to get involved in consultation and discussion.

## 4.0 Conclusions

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- 4.1 The proposed submissions to the NPF4 call for ideas set out an early position for Fife, both as a stand-alone authority and in its regional context, in relation to NPF4. Further updates will be brought to a Fife Council strategic committee as the consultation and development process progresses.

### List of Appendices

1. Fife Council response to NPF4 Call for Ideas
2. Regional submission to NPF4 Call for Ideas relating to the Edinburgh and South East Scotland City Region area

### Background Papers

- National Planning Framework 3, 2014
- Fife Development Plan
- SESplan Strategic Development Plan and TAYplan Strategic Development Plan 2017
- FIFEplan Local Development Plan, 2017
- Fife Economic Strategy, 2017
- Plan 4 Fife Local Outcome Improvement Plan, 2017
- Edinburgh and South East Scotland City Deal, August 2018
- Tay Cities City Deal, April 2019
- 'Climate Fife' Sustainable Energy and Climate Action Plan, 2019
- Regional Transport Strategies (SEStran 2015 and Tactran 2015) and Local Transport Plan/s
- Mid Fife Economic Action Plan (Emerging)
- Tay Cities Economic Strategy, September 2019
- Infrastructure Commission Report, January 2020
- [Edinburgh and South East Scotland City Region Deal Joint Committee](#), Friday, 6th March, 2020 (Item 5.4)

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## **Appendix 1**

### **Fife Council Response to National Planning Framework (NPF) 4 Call for Ideas**

Comments, on how Scotland should look by 2050, are sought by 31<sup>st</sup> March 2020. The Scottish Government National Planning Framework 4 Call for Ideas consultation focuses on 5 key issues as set out below: -

1. What development will we need to address climate change?
2. How can planning best support our quality of life, health and wellbeing in the future?
3. What does planning need to do to enable development and investment in our economy to benefit everyone?
4. How can planning improve, protect and strengthen the special character of our places?
5. What infrastructure do we need to plan and build to realise our long-term aspirations?

#### **1.0 Overview**

1.1 This response provides initial ideas on nationally important landuse priorities for Fife. Key document references are included in Annex 1.

1.2 NPF3 sets out a number of key national priorities for landuse across Fife and the Council consider that NPF4 needs to build upon this. The Local Outcome Improvement Plan, the Plan4Fife (2017) clearly sets out the outcomes which the Council is working towards and places a central focus on Mid Fife - citing the need to address a lack of jobs, poor health outcomes and high deprivation indicators in addition to poor accessibility connections. The key projects relevant to, and submissions made by, Fife within the published NPF3 are listed in Annex 2.

1.3 The Fife Council area is the third largest local authority area within Scotland by population and is a locale which is situated within and serves Central Scotland – linking the North Sea and Forth or Tay Estuary's with the remainder of the Scotland and beyond. Critically, the authority area also contains several nationally significant sites such as UK Ministry of Defence Estate Assets at Leuchars, deep water internationally significant ports at Burntisland and Rosyth in addition to the site of Scotland's last coal fired power station, Longannet (which closed early in 2017).

1.4 It is considered that within Fife, NPF4 will require to not only acknowledge the existing nationally significant sites but consider the further opportunities as set out in this initial response. Fife Council will develop these opportunities further in written and graphic forms for submission to Scottish Government by end June 2020 to inform NPF4 further.

#### **2.0 The Five Questions in the Call for Ideas**

##### **Question 1 - What development will we need to address climate change?**

2.1 Fife Council declared a climate emergency in 2019. It is recognised that Fife Council and the wider community have made considerable progress at reducing emissions and increasing resilience, but that we now need to mobilise to accelerate

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the pace and ambition of our response to the climate crisis. Climate Fife is Fife's most recent response to the climate emergency.

2.2 Planning authorities will have to rethink how and where we build; how we use land; how we move around and how we heat and power our homes and businesses. All of this will need to be considered against the backdrop of public investment programmes and the viability of the private sector to fund change.

2.3 Fife has a strong and growing profile of low carbon sector businesses, a range of site development locations, world-class training and research facilities, and a local authority committed to supporting innovation in carbon reduction. Examples of this include recent investment in Glenrothes District Heat Scheme/s, Lochhead Landfill which includes renewable energy and a heat network and the progression and the establishment at Energy Park Fife, including a wind turbine demonstrator.

2.4 By 2045 Fife Council consider Scotland should be: climate friendly, having transformed the economy, infrastructure, land use and energy system to decarbonise how we live; climate ready, with plans and projects to increase the resilience of communities and the economy to help minimise the impacts from unavoidable climate change; and climate just, ensuring that all communities and the wider environment can benefit from this transition.

2.5 Fife Council is being ambitious in this regard publishing a Climate Fife Action Plan in 2019 which (with associated policies and projects) it is expected will inform and drive future spatial planning strategies. Key areas of focus sought are: Energy Efficiency; Low Carbon Energy; Movement, Storage and Transformation of Energy; Sustainable Transport; Carbon Sequestration; Adaptation; and Innovation and Co-ordination.

2.6 This will require a spatial and land use focus including revised Development Plan strategies, development of design and building policies aligned to energy technology incorporation, continued promotion of sustainable urban drainage networks and green corridors aligned with energy storage or sequestration infrastructure and the promotion or safeguarding of land for community led energy technology schemes. In addition, there is an increase required in renewable energy capacity and output. Fife is well positioned for this with the latent heat resource opportunities of the North Sea and Forth and Tay estuaries and the geothermal opportunities of the central Fife coalfield. This contribution can also be enhanced by the co-location of compatible technologies such as storage and solar.

2.7 In addition, the alignment of Regional Spatial Strategies with other regional activities for example City Region Deals, Regional Economic Partnerships and Regional Transport Partnerships will become critical if the environmental low carbon objectives are to be integrated and achieved. Up to date information and data is also important, such as Scotland's flood maps and priority should be given by the Scottish Government and its agencies to ensure these are kept updated.

2.8 Fife is well placed to build on its strategic business clusters and its circular economy. Clean growth corridors identified nationally could be part of this approach. Green corridors aligned with energy storage or sequestration infrastructure and the promotion or safeguarding of land for community led energy technology schemes, could also be complimented by zero carbon research and innovation projects led by



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an alliance of academia and industry. Within Fife, opportunities arise in the Longannet -Burntisland – Levenmouth corridor (including Forth Ports, Babcock & the Fife Energy Park) and between Dundee and St. Andrews (including St. Andrews University's renewable energy project at Eden Campus, Guardbridge) where assets such as strategic sites and physical and digital infrastructure already exists.

2.9 National policies and funding should have more focus to support regeneration to assist communities and make use of any capacity within existing infrastructure but also, to reduce greenfield land consumption. The importance of Prime Agricultural land should be further protected through national policy.

2.10 Consideration requires to be given as part of Scottish Government Planning Reform to how building regulations and planning policies align to ensure that shared building adaptability targets or similar standards are met. Much of this change should be through building regulations to best ensure that these changes are introduced timeously and are not optional.

### **Question 2 - How can planning best support our quality of life, health and wellbeing in the future?**

2.11 Spatial planning has the potential to lessen the impact of global climate change and help achieve sustainable development. Planning, along with Transportation and aligned, relevant Community Planning strategies, can facilitate increased usage and access to public transport, walking and cycling modes, for example by encouraging higher density development around transport nodes and an increase in mixed land-uses thus helping create balanced communities. National planning policies should be enhanced to help ensure that development proposals deliver good quality places.

2.12 *Homes for all*, a key objective of the Edinburgh & East Scotland Regional Housing Partnership, should also be a central objective for NPF4. The government should set housing targets. Spatial planning through, Local Development Plans, must carefully consider the location, density and type of homes which will be required by 2050. Homes need to be affordable to all, in locations which encourage use of public transport and are protected from environmental changes (such as flooding). As a result of climate change, it may be appropriate to stop further growth in certain areas. The allocation of land to smaller towns and villages, where appropriate, could provide housing choice for local communities, and help sustain local services. The type of houses delivered by housing providers will also become more important as demographic changes continue. Not only do homes need to be delivered in the right locations alongside sustainable modes of travel but they need to be built to accessible standards and of the right size to meet the needs identified in the relevant Housing Needs Demand Assessment.

### **Question 3 - What does planning need to do to enable development and investment in our economy to benefit everyone?**

2.13 Strategic employment sites are identified at Longannet, Rosyth, (these sites are also identified in NPF3 as existing National Developments) Inverkeithing, and in Mid Fife at Burntisland and Methil (Energy Park Fife). The delivery of these sites continues to be a central focus. The Fife Economic Strategy, the emerging Mid Fife

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Action Plan and respective City Deal programmes complement this by aligning economic growth activities, inward investment sector support and funding to ensure that the objectives of Inclusive Growth, Investment, Internationalisation and Innovation are achieved. Through this and other funding streams strategic employment focus is being placed on the realisation of future business infrastructure at Mitchelston Kirkcaldy, Queensway Glenrothes, Hillend and Donibristle, Dalgety Bay, Eden Campus Guardbridge and in Levenmouth.

2.14 Focus also continues to be placed on supporting town centre regeneration especially in Kirkcaldy, Dunfermline, Leven and Cupar. The decline in retail outlets and the changing role of town centres presents an opportunity for different town centre uses, for example housing, workspace and leisure, around a strong public realm.

2.15 Whilst it is recognised that growth brings many benefits, the increased revenue implications to the public sector is becoming challenging and the Scottish Government is urged to recognise and consider this in NPF4. This is particularly challenging in areas like Dunfermline where, growth on a very large scale requires significant new infrastructure, which will require future maintenance. The revenue costs of new schools required in these areas are of a scale that will impact significantly on the financial sustainability of the Council.

2.16 Fife comprises of a number of small and medium sized towns. These settlements have relied upon jobs in traditional manufacturing industries (which are in decline or transitioning to differing forms of sector activity or operational processes) and the public sector (which is experiencing significant funding pressures) and are experiencing the resulting economic impact. Brexit may also compound problems over the next few years, depending on what trade deals are agreed. These may be particularly relevant to land use patterns in North Fife where the rural economy including food production and the international role of Ports such as Dundee, Burntisland and Rosyth may be directly affected. Junction 4 Gateway should continue to be a focus for distribution and access to national leisure activities serving Central Scotland. Junction 3 also provides a Gateway around a strategic employment site, Fife College and park and choose facilities.

2.17 The importance of agriculture and food industries in Fife should be recognised. The identification of potential agri-business corridors should be considered.

### **Question 4 - How can planning improve, protect and strengthen the special character of our places?**

2.18 Digital lifestyles, and the internet, has also changed how communities, businesses and individuals work. Enhancing places to make it easier to walk and cycle to school, local shops and other facilities and improving public realm particularly within town centres. As town centre uses continue to change, accessibility and inclusiveness should be central to their future role. The decline in retail outlets allows for more flexible housing, workspace and leisure activities in town centres.

2.19 Fife's historic, built and natural environments continue to need protection and enhancement – with good place making within communities at the heart with the protection of areas, and buildings, of special character. Within Fife, a Built Heritage

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Strategy is to be progressed during 2020 but meanwhile recognition should be given nationally to the role of Fife in serving the World Heritage Site at the Forth Bridges and in providing national planning support to the promotion and realisation of Mid Fife as a tourism destination, recognising the recently opened long distance footpath which traverses the region linking the Forth and the Tay – The Fife Pilgrims Way.

2.20 Continuing to identify the Central Scotland Green Network as a national development will increase the opportunity to further develop connected, multi-functional greenspaces across the area to add to the already significant resource that is available. This can also include new active travel routes such as paths and cycleways including in Fife the Pilgrims Way and the coastal path network.

2.21 Afforestation projects, especially those involving urban greening and on higher ground upstream, offer a wide range of benefits over and above carbon sequestration: cleaning air, reducing flood risk, and reducing the impact of climate change.

2.22 The protection and enhancement of existing green and blue infrastructure cross Fife towns, as well as the introduction of new spaces, is important to the health and wellbeing of communities, as well as reducing flood risk, and reducing the impact of climate change. Fife has strategic potential in this regard recognising the regional role economically and recreationally of the Forth and Tay but also in promoting further with Scottish Government the regeneration value that is being borne in Mid Fife at Levenmouth assisted by SEPA who are progressing a river corridor project along the River Leven.

### **Question 5 - What infrastructure do we need to plan and build to realise our long-term aspirations?**

2.23 A high frequency, affordable, sustainable transport system should sit at the heart of any National Planning Framework. Multiple benefits include health & wellbeing via active travel; greater connectivity; and reduced carbon footprint. Energy infrastructure to ensure that our places are more sustainable, and green infrastructure particularly in key locations to mitigate climate change impacts.

2.24 Fife's location between two city regions can currently exacerbate regional inequality between cities and hinterlands – better interconnectivity could improve this allowing wider opportunities for more of the population to contribute to the economy, as well as affording the opportunity to access cultural and historical assets. The presence of major transport networks across the region (M90, A92, East Coast Mainline Railway, Queensferry/Kincardine/Tay and Forth road and rail bridge crossings) is not fully recognised with limited national investment in the connecting transport infrastructure within Fife, much of which could contribute positively in improving accessibility within Fife and in turn improve investment opportunities and population retention. This is particularly important within Mid Fife which requires transport improvements to stimulate growth and achieve regeneration. In terms of rail, the electrification of the east coast mainline and/or Fife Circle through Fife would be a significant boost allied with enhanced rail station capacities and facilities, complemented by committed rail investment already announced during 2019/2020.

2.25 The delivery of the Strategic Development Areas (SDAs) are central to the spatial strategy. SESplan, TAYplan and FIFEplan propose a number of SDA sites for development. Development of the SDAs will help achieve the outcomes of the Plan 4

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Fife, Fife's Local Outcome Improvement Plan, and, in particular, contribute to the themes of thriving places and inclusive growth and jobs.

2.26 Strategic Development Areas in Dunfermline, Kirkcaldy, Kelty and St Andrews are progressing. Dunfermline is also one of the seven strategic sites identified in SESplan as a key area of change and growth and is reflected within the Edinburgh & South East Scotland City Deal. Delivery of the remaining strategic development areas, in Cupar, Levenmouth and across the Ore Valley continues to be a central focus. The SDA sites will deliver a large number of affordable homes, and in some cases employment land, as well as delivering a significant scale of new community infrastructure. The delivery of strategic transportation interventions and community facilities (including secondary and primary school provision) to support this growth and the associated revenue costs will continue to be a challenge.

2.27 The onus must shift regarding infrastructure provision for growth from requiring developer or local authority led assessments and provision to preparing a costed, funded and nationally ambitious strategy(s) which recognise that Scotland can and will have connected and cost-effective sustainable infrastructure

2.28 A series of internal Regional Spatial Strategy workshops were held during February and March 2020 from which infrastructure priorities have emerged. These areas of focus, however, require National recognition and resourcing.

### **3.0 Conclusion**

3.1 By 2045 Fife Council consider Scotland should be: climate friendly, having transformed the economy, infrastructure, land use and energy system to decarbonise how we live; climate ready, with plans and projects to increase the resilience of communities and the economy to help minimise the impacts from unavoidable climate change; and climate just, ensuring that all communities and the wider environment can benefit from this transition.

3.2 In conclusion, it is recommended that the forthcoming National Planning Framework should consider addressing the following key issues: -

- Connectivity - high frequency, affordable, sustainable transport system should sit at the heart of any National Planning Framework;
- Infrastructure – especially transportation and greener energy will require public investment programmes to fund change; and
- Economy – supporting greener economies and inclusive growth.

3.3 In the context of the above, it is recommended that National Planning Framework 4 should consider including the following projects for Fife: -

- The strategic transport infrastructure investment required in Fife to support the Council's Strategic Development Area programme as set out within FIFEplan LDP 2017 and, in the case of Dunfermline, reflected within the Edinburgh and South East of Scotland City Deal;
- Promote shared infrastructure in Fife including road networks serving Forth, Kincardine and Tay Bridgeheads. The National Transport Strategy, Strategic

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Transport Projects Review and NPF4 should seek to promote river borne transport or help to repurpose strategic river networks such as the Forth and Tay for economic activity including aquaculture, tourism and local access or biodiversity purposes whilst ensuring that existing road or rail networks serving these locations support this;

- The importance of utility companies identifying new capacity and network reinforcement to support growth and ensure continued water and electricity supply across Fife and beyond;
- Recognise that district heat networks within development growth areas should be considered through legislation to ensure implementation to deliver the stepped change needed in the design of new sustainable places. It may be that opportunity also exists nationally for strategic energy opportunities to also be identified, again using river corridors where opportunities including carbon storage or heat production (geothermal) can be realised. This is exemplified currently on Fife's western boundary where adjacent authorities progressing the Stirling and Clackmannanshire City Deal are scoping a regional energy masterplan – this could be considered nationally for/in the Forth and in turn benefit Fife and beyond;
- The delivery of the Fife Industrial Estate Regeneration programme agreed and funded through the Edinburgh and South East Scotland City Deal needs recognition spatially as do future opportunities for advanced manufacturing sites harnessing potentially existing skills and a strong business base within Glenrothes and Rosyth. There is a significant industry 4.0 growth potential in and around Glenrothes, whilst Rosyth (Babcock) has land and scope for engineering expansion;
- Secure resources focused on specific place or project-based interventions. This will include prioritisation and progression of:
  - The emerging Mid Fife Economic Action Plan – an analysis of, and response to, the weak economic profile of Mid Fife, proposing future areas of job creation and supporting infrastructure;
  - The multi-agency 'Leven Project' and associated connectivity project/s can align with the Levenmouth (Rail) Investment and associated Blueprint. Scottish Government approved the reopening of the Leven Rail Line (estimated cost £70 million). In association, a £10m Levenmouth Blueprint is proposed (jointly funded by Transport Scotland and Fife Council) with a view to promoting economic growth and regeneration in the area as part of the transport investment;
  - Eden Campus - being developed as a national centre of excellence for research and development of low carbon technologies (within the proposed Tay Cities Deal). This could form part of a new Clean Growth Corridor;
  - Strategic Investment Locations – critical roles of Rosyth Port/s, (Rosyth Port Rail Link not committed but discussions on going), Burntisland

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Port, Queensway Glenrothes, Fife Energy Park Levenmouth, Mitchelston Kirkcaldy, and Westfield;

- Improved public transport connectivity with Edinburgh City Centre;
- A985/M90 traffic flow improvements serving Rosyth Port and West Fife including provision of park and choose, passenger ferry or river taxi options. (National support required to provide park and choose and rail facilities in Fife to compliment reduced car use in Edinburgh);
- Taybridge Park and Choose - following the successful Park and Ride facilities at Ferrytoll and Halbeath, it is proposed that a park and choose facility should be provided in the Tay Bridgehead area to assist connectivity and sustainable travel into Dundee and wider Tayside;
- Maritime gateway facilities (passenger and freight) serving Rosyth Port, in addition to scoping opportunities for additional container capacity/freight handling facilities and supporting dual fuel shipping;
- Electrification of the East Coast Main Line and Fife Circular;
- Progression of the Dunfermline to Alloa railway route, and electrification, including delivery of the Charlestown Rail Chord to enable direct westerly access to Rosyth Port; and
- Potential for a rail freight hub in Mid Fife to achieve more of a modal shift from road to rail.

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### Annex 1 - Adopted or Approved Fife Council documents

1. National Planning Framework 3, 2014
2. Fife Development Plan
  - SESplan<sup>1</sup>Strategic Development Plan and TAYplan Strategic Development Plan 2017
  - FIFEplan Local Development Plan, 2017
3. Fife Economic Strategy, 2017
4. Plan 4 Fife Local Outcome Improvement Plan, 2017
5. Edinburgh and South East Scotland City Deal, August 2018
6. Tay Cities City Deal, April 2019
7. 'Climate Fife' Sustainable Energy and Climate Action Plan, 2019
8. Regional Transport Strategies (SEStran 2015 and Tactran 2015) and Local Transport Plan/s
9. Mid Fife Economic Action Plan (Emerging)
10. Tay Cities Economic Strategy, September 2019
11. Infrastructure Commission Report, January 2020

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<sup>1</sup> SESplan 2 is referenced here albeit it is acknowledged that the Proposed Strategic Development Plan (SDP) was not approved by Scottish Ministers. The SDP strategy and regional priorities however remain relevant and are the most recent expression of regional land use priorities. They are also generally consistent with the content of SDP1 (approved in 2013), which does remain part of the extant Development Plan for Fife.

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### Annex 2 - NPF3

The key projects relevant to Fife within the published NPF3, include: -

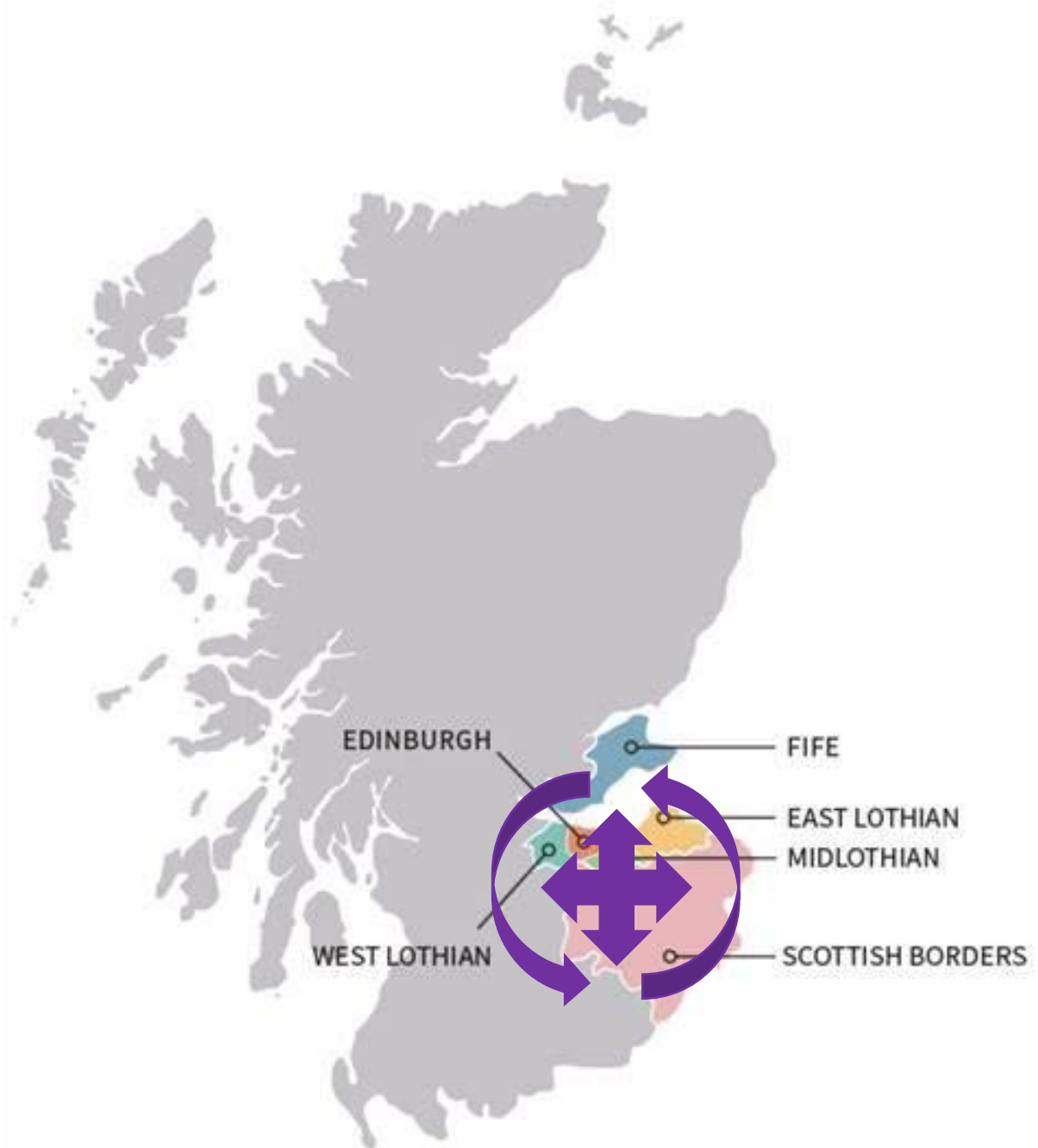
- the specific identification of an Energy Corridor from Longannet to Methil was directly supported within NPF3, however, not as a national project;
- References are made to the National Renewables Infrastructure Plan;
- Reference is made to the completion of the Queensferry Crossing and the improved connectivity it will bring to the east coast;
- NPF3 also states that there should be a more concerted effort to maintain a generous supply of housing land in the SESplan area, an issue that is currently being addressed through FIFEplan. The plan also recognises Glenrothes, Dunfermline and Kirkcaldy as important centres for future growth including services and employment;
- Additional freight handling facilities on the Forth are also highlighted as a national project, focusing on existing or disused harbours and ports. Rosyth is specifically mentioned and supported by NPF3;
- A further relevant national development for Fife is identified under 'a natural resilient place' namely the inclusion of the Central Scotland Green Network;
- Recognition is given to the role and future potential of the Fife Coastal Path; and
- New and replacement facilities at four sites, where Carbon Capture and Storage related developments are proposed, are included collectively as a national development. One of the four is the former power station at Longannet.

Fife also suggested the following in its submission to NPF3: -

- The inclusion of an energy zone linking Methil and Rosyth as a national project was recommended to the Scottish Government alongside recognition of the connectivity and economic value served by M90 and A92 road corridors through Fife;
- The potential for the above corridors in accommodating freight, logistics or distribution activity in addition to the potential (at the M90 around Junction 4 and Junction 3 in Fife) for national leisure or conference facilities to be identified serving Central Scotland;
- The reintroduction into the NPF of the east coast knowledge corridor, including St Andrews;
- The opportunity to provide a spatial framework for wind energy; and
- The need to provide greater spatial guidance on growth and how it fits in with new infrastructure; with the possible introduction of areas of co-ordinated action to delivery land uses and infrastructure together.



# Edinburgh and South East Scotland Regional Response to NPF4 Call for Ideas



# Edinburgh and South East Scotland Regional Response to NPF4 Call for Ideas

## *Purpose*

This document is the response of the Edinburgh and South East Scotland City Region (ESESCR) partners to the Scottish Government's 'Call for Ideas' on the emerging National Planning Framework 4. This submission is set within the context of the partners preparation of a regional growth framework which aims to ensure that the success of the region can continue to be realised and that the region continues to be the key driver of the Scottish economy

The regional growth framework will set out the region's strengths and opportunities. However, it must be recognised that the benefits of success are not experienced by all individuals and communities, and nor are they shared across local authority areas which make up the partnership. Places like the Scottish Borders and Mid Fife do not share the same characteristics of success. Much more needs to be done to ensure that as many of the people across all places within the region can share in benefits in the future. These benefits must also be realised in the most sustainable way possible.

The ESESCR Deal is of national importance with significant implications for Scotland's future growth of Scotland. The aspirations of City Region Deal partners can only be realised if the investment in infrastructure is focused on agreed priorities. This will need a co-ordinated approach by government and government agencies such as Transport Scotland. Several interdependent frameworks need to be aligned, including the National Planning Framework, the National Transport Strategy and the Strategic Transport Project Review in order to achieve this. The findings of the Infrastructure Commission should also be a key consideration and linkage.

## *The Role of the National Planning Framework*

The *Call for Ideas* sets out that NPF4 will consider what Scotland should look like in 2050 and will guide where future development should take place. These are fundamental questions which cannot be answered by looking at the planning process in isolation. To deliver a vision for the future requires a joined-up approach on managing growth so that the right investment can be delivered in the right place at the right time. This will require a joined up multi-agency approach. The National Planning Framework will have a pivotal role in ensuring that the right amount of growth is identified and supported in the right place and that any infrastructure constraints and overheating in the market is addressed. The NPF will also have a role in ensuring that our valuable green spaces are protected.

In order for the South East of Scotland to continue to thrive it is essential that the NPF identifies outcomes which:

- Creates a policy framework which encourages sustainable economic growth.
- Recognises current barriers to nationally significant growth and provides solutions to overcome these barriers.
- Focuses support on those actions which bring the maximum social and economic benefits.
- Ensures linkages across all infrastructure providers to deliver agreed priorities.
- Ensures the linkage between support for growth and the infrastructure necessary to support that growth.
- Provides a framework for growth to be supported in the most sustainable way possible.

This response sets out the view of the City Region Deal partners. It takes a strategic approach and sets out the interventions which will be necessary if the ambitions and aspirations of the City Regional Deal partners are to be met. Appendix 1 sets out the regions response to the five questions set out in the NPF4 Call for Ideas documents. It does not address matters of detail as it is likely that individual partners will wish to respond to the *Call for Ideas* setting out specific matters of relevance to each partner.

### **Context**

Much of Scotland's future economic, population and household growth will take place in this region. Economically, this region is the strongest and best performing in Scotland and one of the best in the UK. It is the best performing in education and productivity measures; has the highest employment growth rate for men and women and the highest growth in business start-ups and mid-sized companies of any Scottish region. It provides a quarter of all of Scotland's business premises with the highest national annual growth rate over the last decade. It also provides for more than a quarter of all Scotland's employment.

However, this success is not experienced by everyone, and there are significant and persistent pockets of deprivation in the region. A successful future depends on a more inclusive distribution of the benefits of the growth, so that I can reach those communities most in need.

The Edinburgh and South East Scotland City Region Deal aims to accelerate growth. This will create new economic opportunities and meaningful new jobs that will help to reduce inequalities. The Deal, its programmes and projects are of national significance and will invest £1.3 billion and deliver 21,000 jobs. It has the potential to deliver over 45,000 homes across seven strategic sites. However, the City Region Deal projects alone cannot address longstanding, deep-rooted issues facing the region and more action and intervention is required to accommodate growth and enable it to transition to a low carbon economy. Key challenges include:

- A just transition to a low carbon economy - The region is currently considering how best to deliver a just transition to a zero-carbon future. This can only be achieved through collective ambition, investment and resources.
- The success and prosperity in the region is not experienced by all. Both the Scottish Borders and Fife sit across more than one region with Tayside in Fife experiencing medium growth and the Scottish Borders experiencing low growth.
- Too many people are unable to move on from low wage and low skill jobs.
- There are pockets of multiple deprivation. Nearly a fifth of our children living in poverty
- Housing need and demand is outstripping supply, especially affordable housing. Increasing the supply and accelerating the delivery of homes across all tenures is critical to

accommodate growth and ensure that the region remains an attractive place to live, work and invest.

- Within the regional core, the commercial and residential markets are overheating. Whilst there is brownfield land that can be redeveloped here, the developable opportunities are limited.
- Lack of connectivity and affordable public transport options both within and across boundaries particularly in many of our rural areas leaving communities disconnected from places of work and opportunity.
- In Edinburgh, 45% of the workforce commutes to work by car with significant traffic congestion experienced on all major routes into the city impacting productivity, air quality and the environment.
- Physical and social infrastructure provision is critical to the delivery of the City Region Deal seven strategic sites and many other strategic development areas across the region. Overcoming funding and delivery solutions is key to unlocking the transformational potential these sites can have for housing supply, jobs and the economy.

The remaining part of this document outlines major areas of change and opportunity, and future priorities for the region as well as a call for collective action to deliver place-based growth.

## Major Opportunities

### *A Better-Connected South-East Scotland*

The interdependence between local partners has never been greater with increased mobility of workers and people choosing to live, work and invest in locations across the region irrespective of local authority boundaries. South East Scotland is well placed to capitalise on improved international, UK cross-border as well as national connectivity, including between Edinburgh and London. Edinburgh Airport, ports on the Firth of Forth and the radial transport corridors to, through and from our region connect it to other UK, Scottish regions and City Region Deals including TayCities and Borderlands. These routes and our digital connectivity provide the means to develop wider relationships and to seek out, attract and share new opportunities.

Edinburgh city centre and the regional core have an unrivalled role, but many of our major cross boundary connections converge elsewhere in the region. A better more sustainably connected region underpins its future success. Some of our key objectives are to promote future growth within the city centre, regional core and along our growth corridors in line with the high-level approach below:

- **Connecting West** – we want to build a new partnership between the Edinburgh and Glasgow City Regions to address labour market linkages, sustainable connectivity and sectoral collaboration. We also want to ensure we take advantage of our shared UK cross border connectivity and associated development opportunities, including logistics, freight and storage and distribution as well as manufacturing;
- **Connecting North** – utilising recent investment in the new Forth crossing, we want to improve connections to the Tay Cities Region and Aberdeen City Region areas, and to make available growth opportunities in key locations within Fife, including the former Longannet Power Station site, Port of Rosyth and Fife Energy Park, as well as around the Forth Bridge heads and at Edinburgh Airport, including growth of our financial, insurance and other professional sectors;

- **Connecting East** – utilising existing and future enhancement of UK cross border connections between south east Scotland, north east England and London we want to reduce journey times and strengthen the UK cross border cities network. Along this corridor there is significant potential to align plans for substantial economic and housing growth in a new regional growth location focused on an enlarged new settlement with new regional town centre, the redevelopment of former Cockenzie Power Station site and a new regional gateway transport hub;
- **Connecting South** – the BioQuarter, Easter Bush and Edinburgh Innovation Park at Musselburgh all cluster around the A720, A1 and East Coast Main Rail Line, Tram Line to Midlothian as well as Borders Rail, which also creates opportunities for sustainable growth and rural regeneration. A potential extension of this line to Carlisle also offers scope to improve UK cross border connectivity between the south of Scotland and the north west of England.

In the future we will continue to use these established corridors to enable a sustainable pattern of development and on-going inclusive growth.

### *Delivering Major Areas of Change*

The emerging RGF has identified key areas of change which builds on the regions existing strengths and assets but also looks to a zero-carbon future and specific areas which will require collective action. These areas include:

- **Economic growth in the urban core** – ensuring Edinburgh city centre has a public realm befitting Scotland’s capital, and a supply of sites and premises to support economic growth at all scales, particularly for SMEs to scale up.
- **Centre for Data Driven Innovation** – Data Capital of Europe – with a world leading DDI cluster around the University of Edinburgh’s main campus in the city centre including assets funded by the City Region Deal - Bayes Centre and Edinburgh Futures Institute.
- **Tourism dispersal and management** – developing clear plans to ensure the visitor economy of the city region works as a single ecosystem, dispersing visitors from hot spots across the region, and into the rest of the country.
- **Town Centres** – town centres across the region have experienced huge changes driven by shifts in the way society lives, works and shops. Town Centres are vital to efforts to reduce carbon and deliver sustainable places, and all our region’s town centres must work to find a new economic purpose.
- **Office market dispersal and management** - opportunity to spread the benefits regionally and from an overheating city centre with limited supply or opportunities for new office space and high levels of productivity consequent on economic focus on finance and insurance and other such sectors, set against surrounding areas that are not as productive consequent on business base and commuting travel patterns.
- **Edinburgh, East Lothian and Midlothian Innovation zone** – Edinburgh BioQuarter, Usher Institute, Edinburgh Innovation Park (Food & Drink), Shawfair and Easterbush; world class innovation and business potential, but also housing growth.
- **Sustainable growth in West Edinburgh and West Lothian** - the airport, development sites, residential growth and sustainable infrastructure, focused on public and active travel improvements.
- **Industrial regeneration in Fife and the Scottish Borders** – City Deal funding is being used to deliver programmes of investment that are strongly focused on innovation and that link to the DDI Programme. The locations chosen for investment are linked to existing growth corridors by

road and by rail and help to maximise the impact of investment in the Borders Railway and plans for the Levenmouth Rail Link, as well as the existing Fife Circle rail line.

- **Coastal regeneration in Edinburgh** – Leith to Granton, public sector owned waterfront sites to create mixed used development of the highest quality. Deliver a single programme, to ensure the right infrastructure is in place, and to work closely with key private sector partners such as Forth Ports.
- **Blindwells New Settlement, former Cockenzie Power Station site and Climate Change Zone** – a major opportunity of national significance for future collective impact and co-ordinated action to deliver a new regional transport hub as well as green, blue, grey and low and zero carbon infrastructure to turn challenges in to opportunities, enable regeneration and the creation of a new regional destination and attractor.
- **The Forth Bridges** – building on the Forth Bridges partnership to drive growth across the World Heritage site.
- **The Forth - A regional climate change response** – the Forth unites the region and requires the region to act collectively to develop measures to mitigate the consequences of climate change on our collective coastline e.g. coastal erosion, rising sea levels, recreational uses and development potential and to protect, conserve and enhance the natural heritage assets there.
- **Longannet** – the site of the former Longannet Power Station is recognised as being of strategic national importance and benefits from critical infrastructure advantages, particularly relating to energy. A transport focus, particularly around rail with upgrading of the existing line and new stations at Longannet, and potentially Kincardine for passenger services, will support the economic future of this key location. This also offers the opportunity to strengthen linkages between the Edinburgh and South East Scotland and other regions to the West, including Falkirk, Clackmannanshire and Stirling.
- **North East Fife** – Guardbridge and Cupar are the key areas of development focus in North East Fife. The University of St Andrews' Eden Campus is the focus of significant investment by the University and the public sector. It will provide space where companies can access University and industrial expertise, engage with other companies, build business-to-business collaborations, and develop and experimentally test innovative new approaches to the development of low-carbon energy systems. Additional employment land will be provided in Cupar. A new regional transport model has now been developed and can be used to test new investment ideas including additional rail halts and the opportunities associated with track improvements at stretches in North East Fife that remain single line.
- **City Region Deal seven strategic sites** - Blindwells; Calderwood; Dunfermline; Edinburgh's Waterfront; Shawfair; Tweedbank; and Winchburgh. Collectively these can deliver over 45,000 new homes, create 9,500 jobs and contribute over £12.6 billion to the wider economy. The sites are all at various stages of development and delivery, each with their own unique set of infrastructure and delivery challenges.

## Future Regional Priorities and Opportunities

A series of future regional priorities have been outlined below. These are emerging priorities and will require further work, consideration and consultation as the RGF develops. These priorities fall broadly into three key thematic areas - **Flourishing, Smart and Resilient**.

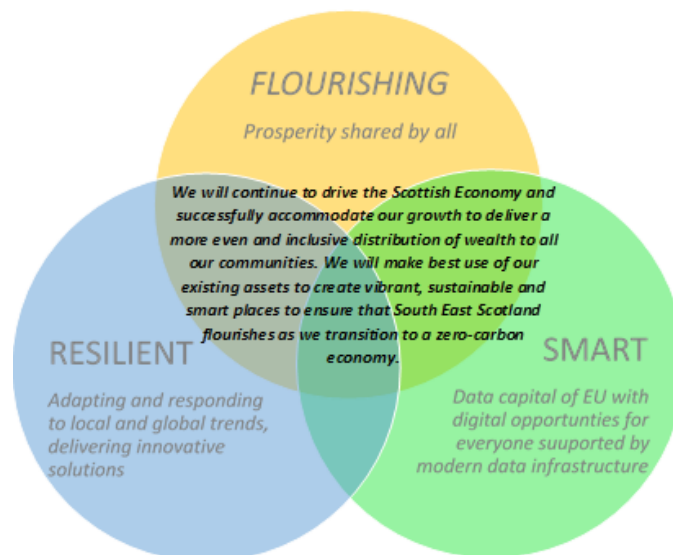


Figure 1 – Emerging RGF themes

### Theme 1 - Flourishing

Spreading the benefits and prosperity more evenly around the region in the future will ensure that inclusive growth is achieved. Technological and climate change is transforming the types of skills requirements and job opportunities available and how companies do business. It is vital that people in the region have the skillsets required to work in key sectors. Future opportunities include:

- **Delivering the 21,000 jobs** that the City Region Deal projects will bring, and helping our most disadvantaged communities have the skills and ability to access these opportunities.
- **The City Region Deal Integrated Regional Employability and Skills (IRES)** Programme will provide part of the support required to help people in the region adapt to these changes.
- **Maximising community benefits** from the City Region Deal and future collaboration projects can deliver economic opportunities linked to areas of disadvantage.
- **Distribution of key sectors and jobs and assets** - building on the region's core sectoral strengths which include tourism, life sciences, data science, tech, finance, fintech, creative industries, food & drink, manufacturing, warehouse and distribution.
- Supporting our **town centres** and existing key sectors including retail, health care, hospitality and more.
- **Growing export value** and the number of exporters. Consider economic opportunities at a regional scale e.g. future warehouse, distribution, industrial and retail uses, and how those organisations maximise their global reach.

## *Theme 2 - Smart*

The region has the ambition of becoming the Data Capital of Europe, ensuring that communities across the region benefit from data driven innovation.

Data is critical to future economic growth, social change, and public services, the region has ambitious plans to establish the City Region as the Data Capital of Europe. The City Region is home to the £1bn+ businesses FanDuel and Skyscanner, and major international tech companies such as Amazon, Cisco, Oracle, Microsoft and IBM have also created bases in the City Region. In terms of academic and research capability, the University of Edinburgh has been ranked first in the UK for computer science and informatics research and Heriot-Watt University is a global leader in Robotics and Artificial Intelligence (RAI). Future opportunities include:

- **Collaboration across public, academic and health sectors** to apply data science, to develop innovative and financially sustainable models of health and social care that improve lives.
- **Data-driven approaches** to prevention, treatment, and health and care service provision, enabling high quality and efficient care within a world-leading learning healthcare system.
- **Delivering business premises** of the future are ready for data-drive innovation opportunities, including the City Region Deal Fife i3 Programme and Central Borders Innovation Park.
- **Smart and future proofed infrastructure** – ensuring the region is at the forefront of new infrastructure and in a position to deliver 5G and superfast broadband across the region that can enable businesses to locate, invest and grow in our more remote and rural locations whilst also allowing people to work from home and more flexibly.

## *Theme 3 - Resilient*

To respond to change the region must be able to adapt. Economic changes, including technological advances are rapidly taking place. Climate change is bringing challenges and opportunities for the region, including the need for adaptation, mitigation and sequestration measures; this could also bring significant opportunities to justly transition to a low carbon economy. Our people also need to adapt in terms of lifestyle, and we must change our skills base to meet the requirements of our future economy.

- **Better connected** - Future priorities to ensure that the region is better connected, include:
  - Measures to increase workforce mobility, especially for residents of disadvantaged communities, primarily through the integration of land use and transport, utilising contra-peak capacity in the transport network and providing reliable, frequent and affordable high-quality public transport.
  - Identifying priority routes for active travel to and from the new strategic housing sites, as well as from main centres of population to centres of employment, education and training as well as other public facilities including health care.
  - Focus on the routes where investment in bus priority measures will have the greatest impact on modal shift and supporting the more disadvantaged communities.
  - Interventions that, individually and/or collectively, demonstrably address climate change and reduce carbon emissions.
  - Considering potential longer-term schemes for tram, light rail and heavy rail.
- **Adaptable and sustainable** - Priorities to ensure that the region can adapt to climate change and transition to zero carbon emissions include:



- **Sustainable Modern Methods of Construction** – The scale and pipeline of regional housing development presents a unique opportunity for innovation and use of offsite manufacturing methods of construction to ensure that homes are future proofed being built to the highest quality and energy efficiency standards with significantly reduced waste and carbon emissions. Continued collaboration with Edinburgh Napier University’s Institute for Sustainable Construction and Construction Scotland Innovation Centre.
- **Energy** - The region already has some significant assets that can help enable the transition to a low carbon economy. However, harnessing this collective potential combined with future investment, behavioural change, and recycling will be essential to meet ambitious local and national targets. Existing key assets and opportunities across the region include:
  - **Energy Park Fife** - Energy Park Fife is a world leading engineering and research zone within the energy sector.
  - **Energy from Waste Plants** - *Maximising connections to* Midlothian and East Lothian sites to deliver low carbon heating in the South East of Scotland.
  - **Geothermal** - There are several former coal fields across south east Scotland, such as the Midlothian and East Lothian and Fife coal fields, where there is significant potential to abstract and make use of warm mine water to develop geothermal heat networks.
  - **Recycling** - Significant expansion in recycling facilities, consideration could be given to regional recycling hubs.
- **Carbon Capture & Sequestration** - Regional actions to absorb additional carbon that we are not able to deal with through reduction measures. Afforestation and enhancing the significant woodland and wetland assets within the region and particularly the Scottish Borders.

A more detailed Regional Growth Framework can consider sustainability impacts and interventions required to facilitate a just transition to net zero carbon, while enabling inclusive and sustainable growth in our communities.

### ***Collaboration – taking a holistic approach to deliver placed based sustainable growth***

Key partners in the delivery of the Regional Growth Framework will be the Edinburgh City Region Deal signatories (the six local authorities, together with regional universities, colleges and the Regional Enterprise Council (includes third, public and private sector representation), UK and Scottish Governments.

The region seeks to deliver a holistic approach with major, planned, integrated initiatives that will allow us to generate, and spread sustainable inclusive growth. Regional partners will work with, and risk-share with Government to make this happen.

To help the region achieve our ambitions we ask for Government support on the following measures:

- Acknowledge the ambitions and priorities of this region as detailed in a future version of the Regional Growth Framework and future SE Interim Regional Spatial Strategy to enable the region to actively engage, collaborate and inform the Scottish Government work on NPF4,

STPR2, Climate Change and ensure that the region's economic, planning, infrastructure, transport and housing priorities are properly articulated so they can be reflected nationally.

- Build on the successful partnership and governance arrangements achieved through the £1.3bn City Region Deal to expand on this success to deliver a truly integrated approach across policy areas.
- Resource and invest in the prospectus and propositions that will follow on from this document in the form of a detailed RGF alongside key national agencies including Scottish Enterprise, Skills Development Scotland, Visit Scotland, Transport Scotland and Scottish Futures Trust.
- Work collaboratively with local, regional and national partners, including academic partners, to consider and develop sustainability and climate change impacts and interventions required to deliver sustainable and inclusive economic growth.
- Consider how future investment funds including post European Structural Funds can support the regions growth and low carbon ambitions.

Play a lead role in linking regions and Deals together to identify complimentary projects and to explore new opportunities, maximise limited investment and efficiencies and reduce duplication. This can enable the region to look West along the M8 to the central belt and Glasgow; North to the TayCities Deal and beyond; East to Newcastle and Northumbria and the south east of England, and South to the Borderlands Deal and across the border.

## Appendix 1 – Edinburgh and South East Scotland City Region Deal response to *The Five Questions in the Call for Ideas*

The *Call for Ideas* for inclusion in NPF4 sets five questions under a banner question of “What do you want planning to do for your place?”

City Region Deal Partners do not see NPF4 as a ‘planning’ document. Delivering and sustaining economic growth requires a partnership approach across all stakeholders. Therefore, first and foremost, NPF4 should set a strategic and binding framework for delivering sustainable growth. To do so will require understanding barriers to growth and the solutions to them. The City Region Deal partners’ views on how sustainable economic growth can be most effectively overcome, and their ask of the Scottish Government through the NPF4 are set out in the responses to the five questions as follows.

### Question 1: What development will be needed to address climate change?

Planning authorities and regional partnerships have been invited to prepare interim regional spatial strategies to inform the content of National Planning Framework. The City Regional Deal partners intend making submissions on this but the work to inform those submissions is not yet complete.

However, the spatial strategy is likely to build upon the strategy set out in the second Strategic Development Plan for Edinburgh and the South East of Scotland (SDP2) with an addition to incorporate the strategy for North East Fife to reflect the geographical extent of the City Region Deal and the agreed extent of the geography for the Interim Regional Spatial Strategy. Additionally, it will outline a series of measures to respond to both the challenges and opportunities presented by climate change.

Although SDP2 was rejected by the Minister this was a result of the Minister not being satisfied that the transportation impacts of the strategy had been properly assessed. There was no indication that the spatial strategy of that document was not acceptable to the Minister and given that the strategy was agreed by all SESplan partners it is appropriate that this forms the basis of the Interim Spatial Strategy.

If the South East of Scotland is to continue to be the engine room of national economic growth in Scotland, the levels of growth set out in SDP2, and the associated spatial strategy, will have to be supported. It should be the role of NPF4 to ensure co-ordination of investment to allow the levels of growth to be achieved. Sustainable growth should not be put at risk as a result of un-coordinated infrastructure responses.

The SDP2 action programme identified the necessary infrastructure to support growth and the strategic elements should feature in NPF4 as a base line. However, a further review should be undertaken in the context of the Infrastructure Commission’s report to see if the interventions set out can be achieved in a way which ensures economic growth while minimising the need to travel by unsustainable means and minimising the impact of existing capacity.

Question 2: How can planning best support our quality of life, health and wellbeing in the future?

Although the South East of Scotland is characterised by economic success this continues to mask significant disparity and disadvantage in the region.

- The success and prosperity in the region is not experienced by all both the Scottish Borders and Fife sit across more than one region with Tayside (Fife) experiencing medium growth and the South (Scottish Borders) experiencing low growth when considering comparable economic performance.
- Too many people unable to move on from low wage and low skill jobs.
- There are pockets of multiple deprivation with nearly a fifth of our children living in poverty.
- Housing need and demand is outstripping supply, especially affordable housing.
- Lack of connectivity and affordable public transport options both within and across boundaries particularly in many of our rural areas leaving communities disconnected from places of work and opportunity.
- A just transition to a low carbon economy - the region is currently considering how best to deliver a just transition to a zero-carbon future. This can only be achieved through collective ambition, investment and resources.

Ensuring sustainable economic growth which increases opportunity for everyone in the South East of Scotland, while protecting our most important environmental assets is key to ensuring quality of life, health and wellbeing.

This will require positive intervention to ensure that those who are furthest from the market, both physically and educationally are able to access employment and training opportunities.

To support this the National Planning Framework should:

- Recognise that a diverse economy will require a range of house types and tenures in the region.
- Establish tenure specific housing targets for the region which are supported by an evidence base of demand for each housing tenure.
- Establish land use strategies which encourage the use of brownfield land before development on greenfield sites.
- Establish land use strategies which are supported by a transport strategy which does not focus solely on maximising capacity and speed for city to city journeys, but which ensures equality of access to regional hubs for all communities and areas of growth.

Question 3: What does planning need to do to enable development and investment in our economy so that it benefits everyone?

While the economy in the South East of Scotland remains the most significant contributor nationally, there continues to be risks to the economic success of the area. To respond to change the region must be able to adapt. This requires a policy framework which provides certainty to businesses and communities but is flexible enough to respond to economic change which could occur rapidly and potentially without warning. The policy framework must recognise the changes which will result from technology and the changes which will be necessary to respond to climate change.

To support this the National Planning Framework should:

- Ensure that there is a strategy for sustainable growth which benefits all parts of the South East of Scotland while protecting important environmental assets.
- Take positive action to avoid the creation of dormitory towns except in circumstances where they are focused on the most sustainable transport options.
- Support measures to increase workforce mobility in the South East of Scotland, especially for residents of disadvantaged communities, primarily through affordable public transport.
- Establish a requirement for developers to deliver priority routes for active travel to and from the new strategic housing sites, as well as from main centres of population to centres of employment, education and training.
- Focus on the routes where investment in bus priority measures will have the greatest impact on modal shift and supporting the more disadvantaged communities.
- Interventions that, individually and/or collectively, demonstrably address climate change and reduce carbon emissions.
- Considering potential longer-term schemes for tram, light rail and heavy rail.
- Provide a framework for the transition to sustainable methods of construction.
- Set a framework for accredited carbon offsetting which will support the transition to a net carbon zero city region.
- Consider the Major Areas of Change highlighted in the main body of this response as potential National developments

Question 4: What policies are needed to improve, protect and strengthen the special character of our place?

The Edinburgh city region is internationally recognised as both a leisure destination and a place to do business. However, that success risks the very basis of that success. It is recognised that Edinburgh is in danger of overheating as both a leisure destination and a place to do business while at the same time significant capacity for growth exists elsewhere in the city region.

The authorities have a role in promoting the advantage of the area outwith the city centre, but more co-ordinated action is required to ensure that these locations become destinations of choice. This will include

To support this the National Planning Framework should:

- Establish a policy framework which protects the region's most important environmental assets from development.
- Support the development of green networks across the region which provide, opportunities to increase access to the countryside, biodiversity and carbon reduction.
- Recognise the significant economic benefit which is derived from tourism to the region and ensure that the infrastructure necessary to support tourism is prioritised.

5: What infrastructure do we need to build to realise our long-term aspirations?

Supporting sustainable economic growth will require a range of infrastructure interventions. That will inevitably require both new infrastructure and investment in current infrastructure to ensure that capacity is being maximised. Historically, the public sector has been adept at identifying the necessary infrastructure – for example through development plan action programmes – but has been less successful in ensuring delivery of the infrastructure because, in most cases, delivery is out with the control of local authorities.

City Regional Deal partners recognise the role of the Infrastructure Commission in securing co-ordination of infrastructure investment and delivery and the work of the commission should be incorporated within the NPF. But the work of the commission also needs to be recognised in the National Transport Strategy and other national strategies. There should be one infrastructure plan for the country which prioritises requirements and identifies funding solutions. The NPF should set growth targets based on the delivery of infrastructure improvements and not the other way around.

In establishing that framework a fundamental rethink is required. In order to ensure sustainable economic growth existing road and rail infrastructure capacity should be maximised. Together with reducing the need to travel, there should be a focus on modal change of freight from road to rail and or sea.

Although rail infrastructure is under pressure during the day time, significant capacity exists at night. Moving greater volumes of freight from road to rail would free up capacity on the road infrastructure to support sustainable travel while reducing the need for further investment in road infrastructure. This should be done in parallel with investment in public transport infrastructure to make community bus a realistic option, particularly for those journeys not focused on regional hubs.

To support this the National Planning Framework should:

- Establish an Action Programme for infrastructure requirements in each region.
- Ensure that the Action Programme prioritises the delivery of infrastructure having regard to economic impact of providing that infrastructure and the level of growth it would support.
- Establish a funding mechanism or mechanisms to ensure delivery of the necessary infrastructure.
- Support measure to ensure that developers build homes which are sustainable and can support homeworking and the use of low carbon technologies including the provision of electric vehicle charging points.